

Chairman Ajit Pai, Chairman
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
425 12th Street SW
Washington, D.C. 20554



August 10, 2017



Mr. Chairman and Commissioners,

As emergency management and public safety professionals in the great State of Texas, we write with great interest in the open proceedings before the Commission on the necessary enhancements that are essential to the success of the Wireless Emergency Alerts (WEA) service. As Commissioners, you have before you both an open Further Notice of Proposed Rulemaking (FNPRM) which has the potential to finally bring WEA to the current state of technology, as well as an alarming Petition for Reconsideration (PFR) of the Commission's Report and Order adopted in September of 2016 that would do great harm by setting back the extraordinary progress that was made this past fall.

At one end of the spectrum is the power to utilize the intelligence of the device to reduce the burden on cellular bandwidth and deliver the level of quality alerts and warnings that Texans expect and deserve. At the other end is a request to peel back the long overdue progress that you have already made and was met with much appreciation and enthusiasm by alert originators from across the country.

To seriously consider granting the PFR would result in a significant breach of the good faith in which carriers, public safety, technology experts, academics, social scientists, and other parties worked diligently to find clear consensus on the timelines associated with the adopted improvements. To be clear, the carriers set those timelines in the Communications Security Reliability and Interoperability Council V (CSRIC) process. Just hours before the CSRIC meeting when the recommended improvements were adopted unanimously, carriers abruptly requested an extension of the agreed-to timeline and public safety officials graciously conceded to those timelines despite the last-minute request. Further, the input from those who have contributed to the record on this topic leave little room for doubt that those timelines already adopted by the Commission are indeed achievable. It is also clear that adopting a rule requiring utilization of the handset capabilities would make those enhancements easier and swifter.

We are gravely concerned about delaying improvements to WEA and strongly urge the Commission to deny the PFR. We just as strongly urge the Commission to at the same time

move forward with deliberate speed to adopt handset-enhanced geo-targeting upgrades considered in the FNPRM.

While the adopted improvements to WEA are a significant step forward, the greatest and most impactful improvement remains to be adopted. The Commission now has a chance to significantly improve targeting of alerts, while also significantly improving the potential impact on wireless networks. The record is clear that this device-assisted upgrade is both transformational and feasible.

In December, AT&T introduced its support for including the intelligence in the handset into the WEA service. As an industry leader, AT&T stated that it "is well aware of capabilities in mobile devices and device operating systems, as well as the APIs available to application developers. Such capabilities can be exploited in development of a managed WEA app."

Terrorist events and natural disasters here in the homeland have time and time again demonstrated the need for device based capabilities in the WEA system. The ability to precisely target at-risk populations while minimizing disruption to others will give emergency managers and other alert originators the confidence to use WEA as the WARN Act intended. Events in Baton Rouge, New York City, Houston/Harris County, California, Orlando and more highlight how a well-targeted message will save lives.

As representatives of a diverse set of Texas public safety officials, we strongly urge the Commission to deny the PFR and to move forward proactively to allow us an improved ability to save lives and property. In addition to denying the PFR, we are counting on you to leverage the intelligence in the device to move the WEA service forward in a meaningful way.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M. Sloan'.

Mark Sloan

Emergency Management Coordinator

Harris County Office of Homeland Security and Emergency Management



A handwritten signature in black ink, appearing to read "Rick Flanagan".

Rick Flanagan

Emergency Management Coordinator

City of Houston Office of Emergency Management



A handwritten signature in black ink, appearing to read "Rocky Vaz".

Rocky Vaz

Managing Director

City of Dallas Office of Emergency Management





Lawrence Trevino
Emergency Management Coordinator
City of San Antonio Office of Emergency Management



Mike Riggs
Emergency Management Coordinator
Metropolitan Transit Authority of Harris County (METRO)



Kharley Bagley Smith
Emergency Management Coordinator
Hays County Office of Emergency Services





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July 31, 2017

Chairman Ajit Pai, Chairman
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
425 12th Street SW
Washington, D.C. 20554

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Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin D. Pagan", with a stylized flourish at the end.

Kevin D. Pagan
City Attorney/Emergency Management Coordinator

East Harris County } *Making Good*

MANUFACTURERS ASSOCIATION

Chairman Ajit Pai, Chairman
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
425 12th Street SW
Washington, D.C. 20554

July 26, 2017

Mr. Chairman and Commissioners,

As emergency management and public safety professionals in the great State of Texas, we write with great interest in the open proceedings before the Commission on the necessary enhancements that are essential to the success of the Wireless Emergency Alerts (WEA) service. As Commissioners, you have before you both an open Further Notice of Proposed Rulemaking (FNPRM) which has the potential to finally bring WEA to the current state of technology, as well as an alarming Petition for Reconsideration (PFR) of the Commission's Report and Order adopted in September of 2016 that would do great harm by setting back the extraordinary progress that was made this past fall.

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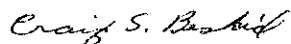
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Sincerely,



Craig Beskid, Executive Director
East Harris County Manufacturers Association, (EHCMA)
7730 Spencer Hwy, Suite 200
Pasadena, TX 77505



Mr. Tom Wheeler
Chairman
Federal Communications Commission
425 12th Street SW
Washington, D.C. 20554

November 30, 2016

Mr. Chairman and Commissioners,

Collectively, we represent the Emergency Management Offices of 15 of the most populous jurisdictions in the United States covering almost 30% of the population. Several of us have participated in this proceeding, both the CSRIC process and the Commission's NPRM, since its beginning. We write today to voice our concern that a device-assisted geo-targeting capability timeline and requirement were not included in the Commission's September 29th Wireless Emergency Alert (WEA) Report and Order, but instead referred to the Commission's accompanying Further Notice of Proposed Rulemaking for additional consideration. This capability is among many important issues under consideration by the Commission such as expanded language, multi-media and the many-to-one option.

While we applaud the Commission's commitment to "adopting even more granular, handset-based, geo-targeting requirements," we strongly believe this work needs to be completed in tandem with the upgrades announced in the Order.

We believe that more precise geo-targeting, enhanced by incorporating the intelligence in our handsets (and, we note, the kind that is used by countless Apps, like Uber, each day), will save lives. Moreover, such a move will engender system trust amongst both alert originators and the public. Precisely targeted messaging means that alerts and warnings can be personalized to a very high degree reducing, if not eliminating, recipient confusion.

A robust public record including commentary from public safety officials, the wireless industry, and academia shows that device assisted geo-targeting is not only technologically feasible but also addresses many of the issues.

The ability to precisely target at-risk populations while minimizing disruption to others will give emergency managers and other alert originators the confidence to use WEA as the WARN Act

intended. As Commissioner Pai stated, "enabling devices to screen emergency messages and only allow the relevant ones through, this approach would allow public safety officials to target information to specific geographic areas. And it would advance WEA as a platform by reducing 'alert fatigue'."

Events in New York City, Orlando, Paris, Louisiana, Texas and elsewhere highlight the importance of precisely targeted public information in generating positive public safety outcomes. Adverse events, natural and man-made, are an unfortunate part of our shared reality. We need an alerting system that is up to those challenges.

Many of us have stated on the record, in meetings, and throughout the CSRIC process, that the recommendations concerning device assisted geo-targeting in *Wireless Emergency Alerts – Recommendations to Improve Geo-Targeting and Offer Many-to-One Capabilities*, Recommendation 3 in particular, are the most important and timely changes to WEA under consideration. Simply put, device based geo-targeting provides the lightest lift with the biggest return.

The record is clear – device based solutions to improve granularity are feasible and should be moving forward on the same timeline as the other WEA upgrades. The 42-month timeline that was negotiated with the industry as part of the CSRIC process should have started with the adoption of the CSRIC report and the Commission's Order. Our country deserves to have this capability incorporated into the WEA service with extreme haste.

Sincerely,



Barb Graff
Chair, Big City Emergency Managers
Director, Office of Emergency Management, Seattle

 12/2/16

Ron Prater
Executive Director
Big City Emergency Managers
